

Daniel W. Fox (SBN 268757)
Jerry S. McDevitt (*pro hac vice*)
jerry.mcdevitt@klgates.com
Christopher S. Finnerty (*pro hac vice*)
chris.finnerty@klgates.com
Morgan T. Nickerson (*pro hac vice*)
morgan.nickerson@klgates.com
Derek W. Kelley (*pro hac vice*)
derek.kelley@klgates.com
K&L GATES LLP
Four Embarcadero Center
Suite 1200
San Francisco, CA 94103
Telephone: (415) 882-8200
Facsimile: (415) 882-8220

Counsel for Defendant
World Wrestling Entertainment, Inc.

Jason S. Takenouchi (CBN 234835)
Kasowitz Benson Torres LLP
101 California Street, Suite 3000
San Francisco, California 94111
Telephone: (415) 421-6140
Fax: (415) 398-5030
JTakenouchi@kasowitz.com

Marc E. Kasowitz (*pro hac vice*)
Christine A. Montenegro (*pro hac vice*)
Nicholas A. Rendino (*pro hac vice*)
Kasowitz Benson Torres LLP
1633 Broadway
New York, New York 10019
Telephone: (212) 506-1700
Fax: (212) 506-1800
mkasowitz@kasowitz.com
cmontenegro@kasowitz.com
nrendino@kasowitz.com

Counsel for Plaintiff
MLW Media LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Case No. 5:22-cv-00179-EJD

MLW MEDIA LLC,

Plaintiff,

v.

WORLD WRESTLING ENTERTAINMENT,
INC.,

Defendant.

**STIPULATION AND [PROPOSED]
ORDER TO RESCHEDULE HEARING
DATE**

RECITALS

WHEREAS, Plaintiff MLW Media, LLC (“MLW”) filed its First Amended Complaint (Dkt. 64) on March 6, 2023;

WHEREAS, Defendant World Wrestling Entertainment, Inc. (“WWE”) filed its Motion to Dismiss the Plaintiff’s First Amended Complaint (“Motion to Dismiss”) on April 7, 2023 and reserved a hearing date for July 20, 2023 (Dkt. 68).

WHEREAS, on May 17, 2023 the Court advanced the hearing date for WWE’s Motion to Dismiss to June 15, 2023 (Dkt. 70).

WHEREAS, counsel for WWE are unavailable on June 15, 2023.

WHEREAS, the parties have agreed on their availability for a hearing on July 20, 2023 at 9 A.M. and have confirmed that date’s availability with the Judicial Clerk and Deputy of the Court.

NOW, THEREFORE, the parties do further stipulate and agree as follows:

STIPULATION

1. The hearing date for WWE’s Motion to Dismiss shall be rescheduled from June 15, 2023 to July 20, 2023 at 9:00 A.M.

K&L GATES LLP

Dated: June 2, 2023

By: /s/ Christopher S. Finnerty

Daniel W. Fox
Jerry S. McDevitt
Christopher S. Finnerty
Morgan T. Nickerson
Derek W. Kelley
Attorneys for Defendant
World Wrestling Entertainment, Inc.

KASOWITZ BENSON TORRES LLP

Dated: June 2, 2023

By: /s/ Christine A. Montenegro

Marc E. Kasowitz (*pro hac vice*)
Christine A. Montenegro (*pro hac vice*)
Jason S. Takenouchi (CBN 234835)
Nicholas A. Rendino (*pro hac vice*)

Attorneys for Plaintiff
MLW Media LLC

[PROPOSED] ORDER

The parties' stipulation is approved. The hearing date for WWE's Motion to Dismiss the Plaintiff's First Amended Complaint shall be rescheduled from June 15, 2023 to July 20, 2023 at 9:00 A.M.

DATED: _____

Edward J. Davila
United States District Judge